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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

| Bankruptcy Case No. 19-30088 (DM)

PG&E CORPORATION.

Chapter 11 (Lead Case) (Jointly Administered)

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

**DEBTORS' REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF DEBTORS' OBJECTION TO CLASS
REPRESENTATIVE'S MOTION TO EXTEND
APPLICATION OF FEDERAL RULE OF CIVIL
PROCEDURE 23 TO PROOF OF CLAIM**

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

Date: January 29, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
2 debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-captioned
3 chapter 11 cases (the “**Chapter 11 Cases**”), by and through its attorneys, hereby requests the Court to
4 take judicial notice pursuant to Federal Rule of Evidence 201, as made applicable to this adversary
5 proceeding by Bankruptcy Rule 9017, of the following facts:

6 1. Attached as **Exhibit A** hereto is a true and correct copy of the *Amended Stipulation and*
7 *Order to Consolidate and File Third Amended Consolidated Class Action Complaint* filed in *In re PG&E*
8 *Corporation Securities Litigation*, Case No. 18-03509 (N.D. Cal.) (the “**Securities Litigation**”) on
9 May 7, 2019 [Dkt. No. 117].

10 2. Attached as **Exhibit B** hereto is a true and correct copy of the *Third Amended*
11 *Consolidated Class Action Complaint* filed on May 28, 2019 in the Securities Litigation [Dkt. No. 121].

12 3. Attached as **Exhibit C** hereto is a true and correct copy of the *Order Denying Motion for*
13 *Preliminary Injunction* filed in *PG&E Corp. v. Public Employees Retirement Association of New Mexico*
14 (*PERA*), Adv. Pro. No. 19-03039 (Bankr. N.D. Cal.) (the “**PERA Adversary Proceeding**”) on August
15 28, 2019 [Dkt. No. 23].

16 4. Attached as **Exhibit D** hereto is a true and correct copy of the *Stipulation and Agreement*
17 *for Order Regarding Scheduling Only as to Public Employees Retirement Association of New Mexico*
18 filed in *PG&E Corp. v. PERA et al.*, Adv. Pro. No. 19-03006 (Bankr. N.D. Cal.) (the “**Non-Debtor**
19 **Defendants Adversary Proceeding**”) on April 3, 2019 [Dkt. No. 34].

20 5. Attached as **Exhibit E** hereto is a true and correct copy of the *Stipulated Order Regarding*
21 *Scheduling Only as to Public Employees Retirement Association of New Mexico* filed in the Non-Debtor
22 Defendants Adversary Proceeding on April 5, 2019 [Dkt. No. 37].

23 6. Attached as **Exhibit F** hereto is a true and correct copy of the *Stipulation and Agreement*
24 *for Order Between Debtors and the Public Employees Retirement Association of New Mexico* filed in
25 the Non-Debtor Defendants Adversary Proceeding on May 1, 2019 [Dkt. No. 42].

7. Attached as **Exhibit G** hereto is a true and correct copy of the *Order Granting Stipulation Between Debtors and the Public Employees Retirement Association of New Mexico* filed in the Non-Debtor Defendants Adversary Proceeding on May 2, 2019 [Dkt. No. 44].

8. Attached as **Exhibit H** hereto is a true and correct copy of the *Debtors' Complaint for Preliminary and Permanent Injunctive Relief as to In re PG&E Corp. Securities Litig., 18-CV-03509 (N.D. Cal.)* filed in the PERA Adversary Proceeding on June 18, 2019 [Dkt. No. 1].

9. Attached as **Exhibit I** hereto is a true and correct copy of the *Debtors' Motion for a Preliminary Injunction as to In re PG&E Corp. Securities Litig., 18-CV-035059 (N.D. Cal.) and Memorandum of Points and Authorities in Support* filed in the PERA Adversary Proceeding on June 18, 2019 [Dkt. No. 2].

10. Attached as **Exhibit J** hereto is a true and correct copy of the *Declaration of Elizabeth Collier in Support of Debtors' Motion for a Preliminary Injunction as to In re PG&E Corp. Securities Litig., 18-CV-03509 (N.D. Cal.)* filed in the PERA Adversary Proceeding on June 18, 2019 [Dkt. No. 3].

11. Attached as **Exhibit K** hereto is a true and correct copy of the *Securities Lead Plaintiff's Memorandum of Points and Authorities in Opposition to Debtors' Motion for Preliminary Injunction as to In re PG&E Corp. Securities Litig., 18-CV-03509 (N.D. Cal.)* filed in the PERA Adversary Proceeding on June 18, 2019 [Dkt. No. 12].

WEIL, GOTSHAL & MANGES LLP

KELLER & BENVENUTTI LLP

By: /s/ Richard W. Slack
Richard W. Slack

*Attorneys for Debtors
and Debtors in Possession*